

Transcript of Andreea Iacobeti
Conducted on September 21, 2023

1 (1 to 4)

<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF MARYLAND</p> <p>3 NORTHERN DIVISION</p> <p>4 -----x</p> <p>5 ANDREEA IACOBETI, :</p> <p>6 Plaintiff, :</p> <p>7 vs. : Case No.: 1:23-CV-1758</p> <p>8 GENNA LEIGH ROSE WEEKS, :</p> <p>9 Defendant. :</p> <p>10 -----x</p> <p>11</p> <p>12 Deposition of ANDREEA IACOBETI</p> <p>13 Ocean City, Maryland</p> <p>14 Thursday, September 21, 2023</p> <p>15 11:53 a.m.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 506649</p> <p>21 Pages: 1 - 71</p> <p>22 Recorded By: Clinton Carmichael</p>	<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 ON BEHALF OF THE DEFENDANT:</p> <p>4 ANNE KELLEY HOWARD, ESQUIRE</p> <p>5 BUDOW AND NOBLE, PC (ROCKVILLE)</p> <p>6 Twinbrook Metro Plaza</p> <p>7 12300 Twinbrook Parkway, Suite 540</p> <p>8 Rockville, Maryland 20852</p> <p>9 301.654.0896</p> <p>10</p> <p>11 ON BEHALF OF THE PLAINTIFF:</p> <p>12 WILLIAM C. HUDSON, ESQUIRE</p> <p>13 THE LAW OFFICE OF WILLIAM C. HUDSON</p> <p>14 9748 Stephen Decatur Highway, Suite 111</p> <p>15 Ocean City, Maryland 21842</p> <p>16 410.957.3465</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>1 Deposition of ANDREEA IACOBETI,</p> <p>2 held at the offices of:</p> <p>3</p> <p>4</p> <p>5 THE LAW OFFICE OF WILLIAM C. HUDSON</p> <p>6 9748 Stephen Decatur Highway, Suite 111</p> <p>7 Ocean City, Maryland 21842</p> <p>8 410.957.3465</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13 Pursuant to Notice, before Clinton Carmichael,</p> <p>14 Notary Public in and for the State of Maryland.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 C O N T E N T S</p> <p>2 EXAMINATION OF ANDREEA IACOBETI PAGE</p> <p>3 By Ms. Howard 5</p> <p>4</p> <p>5</p> <p>6 E X H I B I T S</p> <p>7 (None marked.)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

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5 (17 to 20)

<p>17</p> <p>1 are these friends that you met here?</p> <p>2 A No, my friends from Romania.</p> <p>3 Q Oh, I see.</p> <p>4 A Yeah.</p> <p>5 Q All right. Now, do you -- you do</p> <p>6 recall being in an accident on July 26th of '22;</p> <p>7 is that right? Do I have it right? Do you recall</p> <p>8 being in an accident last Summer in Ocean City?</p> <p>9 A Yes.</p> <p>10 Q All right. And the police report says</p> <p>11 it happened on July 26th, 2022; does that sound</p> <p>12 about right?</p> <p>13 A Yes.</p> <p>14 Q And also, the police report says the</p> <p>15 accident happened around 12:13 p.m., so just after</p> <p>16 noon, 15 minutes after noon; does that sound about</p> <p>17 right?</p> <p>18 A Yes.</p> <p>19 Q Okay. Do you remember the accident?</p> <p>20 A No, I don't remember.</p> <p>21 Q Okay. What is the last -- do you</p> <p>22 remember anything about that date?</p>	<p>19</p> <p>1 A Yes.</p> <p>2 Q Okay. And would you expect to have</p> <p>3 worked until 3:00, or is it as soon as you're</p> <p>4 finished with your rooms you're allowed to leave?</p> <p>5 A Yeah. When you finish with your rooms,</p> <p>6 you can leave.</p> <p>7 Q Do you still get paid until 3:00?</p> <p>8 A I don't remember.</p> <p>9 Q You -- okay. Well, what about now? If</p> <p>10 you finish early, do you get paid for the full day?</p> <p>11 A No.</p> <p>12 Q Oh, I see. Okay.</p> <p>13 A You clock -- when you clock out, the</p> <p>14 14 hours you get, you're paid for that.</p> <p>15 Q Okay. So slowly, where were you going</p> <p>16 to pay your rent? I know it's -- I know you said</p> <p>17 it was on 17th Street, but where would it -- where</p> <p>18 was it?</p> <p>19 A So it's next to the church. I don't</p> <p>20 know the name of the church, but it's United</p> <p>21 office.</p> <p>22 Q United?</p>
<p>18</p> <p>1 A Yeah, so in the morning I told my</p> <p>2 manager that I want to pay my rent in my break --</p> <p>3 in my break lunch. And I think -- so my last</p> <p>4 remember is that I was in the park of the hotel</p> <p>5 and then I wake up in the ambulance.</p> <p>6 Q Okay.</p> <p>7 A That's it, all I remember from that day.</p> <p>8 Q All right. So did you say that you</p> <p>9 told your manager, I guess that's at Quality Inn --</p> <p>10 A Uh-huh.</p> <p>11 Q -- that you wanted to, during your</p> <p>12 lunch break, run an errand to pay your rent?</p> <p>13 A Yes.</p> <p>14 Q So if you had been able to do that,</p> <p>15 what would you have done? And say there's no</p> <p>16 accident, what -- what would you -- would've --</p> <p>17 A Yes. So I wanted to go on the 17th</p> <p>18 Street to United office to pay my rent and then to</p> <p>19 go back to work, because I didn't finish my rooms</p> <p>20 in that day.</p> <p>21 Q All right. So your normal shift you</p> <p>22 said was 9:00 to 3:00 in the height of the Summer?</p>	<p>20</p> <p>1 A United. Yeah.</p> <p>2 Q And that -- that's your landlord, I</p> <p>3 guess?</p> <p>4 A It was last year.</p> <p>5 Q Okay.</p> <p>6 A I mean, so United office, it was my</p> <p>7 sponsor, and they help us. They -- they help the</p> <p>8 J-1 students with the rent and maybe some, I don't</p> <p>9 know, things. So yeah, there it was where I</p> <p>10 needed to pay my rent.</p> <p>11 Q Okay. Do you happen to remember</p> <p>12 anything about what -- what the weather was like</p> <p>13 that day?</p> <p>14 A No.</p> <p>15 Q Do you remember coming from, I guess at</p> <p>16 that time you were living at Bonita, and you</p> <p>17 would've left your home and come to work that</p> <p>18 morning?</p> <p>19 A No.</p> <p>20 Q How did you get to work that morning?</p> <p>21 A I -- I think it was like every day on</p> <p>22 my bike, but I -- I don't remember that day. I</p>

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10 (37 to 40)

<p style="text-align: right;">37</p> <p>1 Messenger, Facebook, Instagram, and everything.</p> <p>2 Q Uh-huh. Have -- has anyone, any of</p> <p>3 your friends or family told you that they were</p> <p>4 talk -- that you were talking to them at the time</p> <p>5 of the accident?</p> <p>6 A No.</p> <p>7 Q Have you ever looked at any of the</p> <p>8 detail on your Messenger account to see if you</p> <p>9 were texting or IMing anyone at the time of the</p> <p>10 accident?</p> <p>11 A No.</p> <p>12 Q You haven't looked one way or the</p> <p>13 other? You just haven't checked?</p> <p>14 A No.</p> <p>15 Q Okay.</p> <p>16 A I didn't check.</p> <p>17 Q So did you tell me that you have seen a</p> <p>18 police report from the accident?</p> <p>19 A The police report, yes.</p> <p>20 Q Okay. In the police report, it has a</p> <p>21 sentence that says witness states that pedestrian</p> <p>22 was actively looking down at her phone as she</p>	<p style="text-align: right;">39</p> <p>1 they didn't work very well. Then I had the</p> <p>2 accident, and then they repaired after the</p> <p>3 accident. This is what I saw in the newspaper.</p> <p>4 Q Uh-huh. Did you ever write to the city</p> <p>5 or the government to say, why did you take three</p> <p>6 hours to fix the light?</p> <p>7 A No.</p> <p>8 Q In the -- before the accident, when you</p> <p>9 had to cross Coastal Highway for whatever reason</p> <p>10 or the principle road from the ocean to the bay,</p> <p>11 would -- would you normally go all the way across</p> <p>12 at once or would you normally stop in the middle</p> <p>13 and then wait for traffic to stop and go again?</p> <p>14 A If the light, it's working?</p> <p>15 Q If the light's working.</p> <p>16 A Okay. So first of all, I'm looking on</p> <p>17 the left side to see if the car stopped, and then</p> <p>18 I'm slow down the -- my walk, and then I -- I need</p> <p>19 to see the right side to see if they're stopping</p> <p>20 or not. So this is what I usually do.</p> <p>21 Q Okay. And what if you're at an</p> <p>22 intersection that has, you know, where the button</p>
<p style="text-align: right;">38</p> <p>1 crossed.</p> <p>2 Are you able to corroborate that you</p> <p>3 were looking at your phone as you were crossing</p> <p>4 the street?</p> <p>5 A I don't remember.</p> <p>6 Q Are you -- you're not able to deny that</p> <p>7 either; correct?</p> <p>8 A I can't say anything because I don't</p> <p>9 remember.</p> <p>10 Q Okay. Have you ever learned whether or</p> <p>11 not the lights controlling traffic for cars or</p> <p>12 bicycles, like red, green, yellow lights, if they</p> <p>13 were working at the intersection of 17th and the</p> <p>14 principle highway at the time of the accident?</p> <p>15 You don't know one way or the other?</p> <p>16 A No.</p> <p>17 Q Has any -- not talking about the</p> <p>18 lawyers, but has anybody told you that the lights</p> <p>19 were not working red, green, yellow for cars at</p> <p>20 the --</p> <p>21 A After -- after the accident, I saw the</p> <p>22 newspaper, and it was writing that at 9:00 a.m.</p>	<p style="text-align: right;">40</p> <p>1 you can press and you'll get the walking signal or</p> <p>2 the noise, do you still look left and right?</p> <p>3 A Yes.</p> <p>4 Q Okay. Do you recall whether you got</p> <p>5 any noise, a beeping sound that was okay to cross</p> <p>6 on the date of the accident?</p> <p>7 A I don't remember.</p> <p>8 Q You don't remember?</p> <p>9 A No.</p> <p>10 Q If you're crossing the street and you</p> <p>11 -- there's cars stopped in the intersection, not</p> <p>12 in the intersection, but waiting to go at a light,</p> <p>13 and they're sort of blocking your view of the</p> <p>14 other lanes.</p> <p>15 What do you do?</p> <p>16 A I don't understand.</p> <p>17 Q So let's say you're at Quality Inn,</p> <p>18 you're trying to cross over to the church.</p> <p>19 A Okay.</p> <p>20 Q Okay. And you start crossing three</p> <p>21 lanes, and then there's the middle; right?</p> <p>22 A Yes.</p>



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11 (41 to 44)

<p>41</p> <p>1 Q And there's parked cars there. Well, 2 not parked, but they're stopped waiting to make a 3 left turn onto 17th to go to the beach or 4 something. 5 A Yes. 6 Q And you -- and you can't see all -- all 7 the oncoming traffic in the through lanes. 8 A Okay. I stop in a safe place. 9 MR. HUDSON: Let me -- I -- I'm going 10 to object, but you can answer as best you can. 11 MS. HOWARD: Yeah. 12 MR. HUDSON: There's just -- there's 13 some variables that I think are up in the air with 14 -- with -- with respect to the question. 15 BY MS. HOWARD: 16 Q So let's say you're -- you're -- you're 17 crossing Coastal Highway from the Quality Inn over 18 to the church. The light's working perfectly. 19 You come up; you press the button. The walking 20 man turns -- it turns white. The beeping starts 21 and you start crossing. Do -- you already told me 22 you would look for traffic even though you had the</p>	<p>43</p> <p>1 can cross, I will cross the street right when it's 2 safe for me to cross the street. 3 Q But you can't remember whether you -- 4 what happened when you crossed on this particular 5 day? 6 A No, I don't remember. 7 Q Okay. Have you in the past looked at 8 your phone as you crossed the street? 9 A If I was looking on my phone in another 10 days -- 11 Q Yeah. 12 A -- when I was trying to cross? I don't 13 remember. 14 Q Okay. But it's possible? 15 A It's possible. 16 Q According to the police report, there 17 was somebody on a bicycle who was crossing in -- 18 in the same area as you. Did you -- did you -- do 19 you know who that was? 20 A No, I don't know her or him. 21 Q And you didn't see -- you don't 22 remember seeing a bicyclist?</p>
<p>42</p> <p>1 signal; right? 2 A Yes. 3 Q Okay. And then you get to the middle, 4 right, and so now the cars would be coming from 5 your right to your left -- 6 A Yes. 7 Q -- right? 8 A Yes. 9 Q Okay. If there's -- cars are -- like a 10 car is stopped in the left turn lane, stopped 11 waiting to make a left turn or stopped because its 12 light is red or something like that, and if you 13 were unable to see if cars were coming up to the 14 intersection, what would you do? 15 MR. HUDSON: Objection, but you're 16 going to -- you can answer as best you can. 17 THE WITNESS: I stop to be sure that I 18 can cross the street. 19 Q Okay. And then would you just -- what 20 would you do if you saw cars coming? 21 A I stop in a safe place to be sure that 22 I can cross or not. And when I saw them, that I</p>	<p>44</p> <p>1 A I don't remember the accident and 2 everything before and after the accident. 3 Q So let me just ask you this, what -- if 4 you don't remember the accident, what makes you 5 think that my client is responsible for the 6 accident that you sued her? 7 A So because -- because I was with 8 somebody when I was trying to cross the street, 9 that means all the cars see us and let us to cross 10 the street like they normally do if they pay 11 attention to the pedestrians. So because I saw 12 maybe that lady or the boy next to me, I was safe 13 to cross the street with him or her, so -- 14 Q So you're saying that from reviewing 15 the police report and learning that there was a 16 bicyclist near you, you think that it was probably 17 safe to cross because there was two of us? 18 A Yes. 19 Q Anything else that makes you think my 20 client did something wrong? 21 A No. 22 Q Okay. So in your answers to</p>

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18 (69 to 72)

<p>69</p> <p>1 Q Okay. All right. All right. Did you</p> <p>2 have any problems doing your work at Quality Inn</p> <p>3 this Summer in '23?</p> <p>4 A If you mean about pain, yes.</p> <p>5 Q Yes. Did the -- did the amount of pain</p> <p>6 you had at work stop you from going to work?</p> <p>7 A So in the morning, everything, it's</p> <p>8 okay. But when I'm going to work, the -- it's</p> <p>9 being painful because I need to grab the bed,</p> <p>10 which it's very heavy, so the -- and the rest of</p> <p>11 the day, my back, it's painful.</p> <p>12 Q Okay. And then what about the serving</p> <p>13 job?</p> <p>14 A It's easy.</p> <p>15 Q Okay. But again, because of the</p> <p>16 economic opportunity for the -- you lift the beds</p> <p>17 just to complete the job. Okay. All right.</p> <p>18 MS. HOWARD: All right. I think that's</p> <p>19 all the questions I have.</p> <p>20 MR. HUDSON: And I have no questions at</p> <p>21 all. We'll -- we'll read and sign.</p> <p>22 (Off the record at 12:53 p.m.)</p>	<p>71</p> <p>1 CERTIFICATE OF TRANSCRIBER</p> <p>2 I, Brandi McLean, do hereby certify</p> <p>3 that this transcript was prepared from the digital</p> <p>4 audio recording of the foregoing proceeding; that</p> <p>5 said proceedings were reduced to typewriting under</p> <p>6 my supervision; that said transcript is a true and</p> <p>7 accurate record of the proceedings to the best of</p> <p>8 my knowledge, skills, and ability; and that I am</p> <p>9 neither counsel for, related to, nor employed by</p> <p>10 any of the parties to the case and have no</p> <p>11 interest, financial or otherwise, in its outcome.</p> <p>12</p> <p>13 </p> <p>14 BRANDI MCLEAN</p> <p>15 PLANET DEPOS, LLC</p> <p>16 10/5/2023</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>70</p> <p>1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC</p> <p>2 I, Clinton Carmichael, the officer</p> <p>3 before whom the foregoing proceedings were</p> <p>4 taken, do hereby certify that any witness(es) in</p> <p>5 the foregoing proceedings were fully sworn;</p> <p>6 that the proceedings were recorded by me and</p> <p>7 thereafter reduced to typewriting by a</p> <p>8 qualified transcriptionist; that said digital</p> <p>9 audio recording of said proceedings are a</p> <p>10 true and accurate record to the best of my</p> <p>11 knowledge, skills, and ability; and that I am</p> <p>12 neither counsel for, related to, nor employed</p> <p>13 by any of the parties to this case and have</p> <p>14 no interest, financial or otherwise, in its</p> <p>15 outcome.</p> <p>16</p> <p>17 </p> <p>18 CLINTON CARMICHAEL,</p> <p>19 NOTARY PUBLIC FOR THE STATE OF MARYLAND</p> <p>20</p> <p>21</p> <p>22</p>	